

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:11-cv-4574 (RK)
)	
LM ERICSSON TELEPHONE COMPANY,)	
)	
QUALCOMM INC.,)	
)	
ALCATEL-LUCENT USA INC.,)	
)	
and)	
)	
THIRD GENERATION PARTNERSHIP)	
PROJECT, a/k/a 3GPP)	
)	
Defendants.)	
_____)	

ORDER

AND NOW, on this ____ day of _____, 2013, upon consideration of Plaintiff TruePosition, Inc.'s Motion for Leave to File Under Seal Its Cross-Motion to Amend Protective Order and Opposition to Defendants' Motion to Compel Discovery, and its Declarations of Stuart Salen and Taline Sahakian, with Exhibits in support, and good cause being shown, it is hereby ORDERED and DECREED that Plaintiff's Cross-Motion to Amend Protective Order and Opposition to Defendants' Motion to Compel Discovery, and its Declarations of Stuart Salen and Taline Sahakian, with Exhibits in support, shall be filed and maintained UNDER SEAL.

BY THE COURT

Hon. Robert F. Kelly, U.S.D.J.

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TRUEPOSITION, INC.)	
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Plaintiff,)	
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v.)	Case No. 2:11-cv-4574 (RK)
)	
LM ERICSSON TELEPHONE COMPANY,)	
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QUALCOMM INC.,)	
)	
ALCATEL-LUCENT USA INC.,)	
)	
and)	
)	
THIRD GENERATION PARTNERSHIP)	
PROJECT, a/k/a 3GPP)	
)	
Defendants.)	
)	

**MOTION OF PLAINTIFF TRUEPOSITION, INC. FOR LEAVE TO FILE
UNDER SEAL ITS CROSS-MOTION TO AMEND PROTECTIVE ORDER AND
OPPOSITION TO DEFENDANTS' MOTION TO COMPEL DISCOVERY AND
DECLARATIONS OF STUART SALEN AND TALINE SAHAKIAN**

Plaintiff TruePosition, Inc. hereby moves for leave to file under seal its Cross-Motion to Amend Protective Order and Opposition to Defendants' Motion to Compel Discovery, and its Declarations of Stuart Salen and Taline Sahakian, with Exhibits in support. The Cross-Motion and Opposition to Defendants' Motion to Compel and the Salen and Sahakian Declarations reference matters that have been designated "Outside Counsel Eyes Only" pursuant to the Court's January 16, 2013 Protective Order. Therefore, in compliance with Paragraph 11 of the Protective Order, Plaintiff moves to file its Cross-Motion to Amend Protective Order and Opposition to Defendants' Motion to Compel Discovery, and its Declarations of Stuart Salen and Taline Sahakian, with Exhibits in support under seal.

Date: November 13, 2013

Respectfully submitted,

s/John G. Harkins, Jr.

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CERTIFICATE OF SERVICE

I, Evelyn R. Protano, hereby certify that on November 13, 2013 I caused a true and correct copy of the Motion of Plaintiff TruePosition, Inc. for Leave to File Under Seal its Cross-Motion to Amend Protective Order and Opposition to Defendants' Motion to Compel Discovery, and its Declarations of Stuart Salen and Taline Sahakian, with Exhibits in support, to be served upon the following by ECF and the following means:

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s/Evelyn R. Protano